

May 31, 2023

Gregg L. Weiner  
Ropes & Gray LLP  
1211 Avenue of the Americas  
New York, NY 10036

Michael N. Ungar  
Ulmer & Berne LLP  
1660 W. 2nd Street, Ste. 1100  
Cleveland, Ohio 44113

**BY CM/ECF & HAND DELIVERY**

The Honorable Lewis A. Kaplan  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl Street  
New York, NY 10007-1312

Re: ***Telecom Business Solution, LLC, et al., v. Terra Towers Corp., et al.,***  
Civil Action No.: 1:22-cv-01761

Your Honor:

Undersigned counsel represent Telecom Business Solution, LLC and LATAM Towers, LLC (collectively, “Peppertree”), and AMLQ Holdings (Cay), Ltd. (“AMLQ,” together with Peppertree, “Peppertree/AMLQ”) in the above-captioned action (the “Action”). Pursuant to Federal Rule of Civil Procedure 5.2(d), Peppertree/AMLQ respectfully seek leave to file under seal their Memorandum in Opposition to the Petition to Vacate the Fourth Partial Final Award (the “Opposition”), filed by Respondents Terra Towers Corp., TBS Management, S.A., and DT Holdings, Inc. (together, “Terra/DTH”).

By way of background, this Action relates to the American Arbitration Association matter of *Telecom Business Solution, LLC et al. v. Terra Towers Corp. et al.*, AAA Case No. 01-21-0000-4309 (the “Arbitration”). In a procedural order issued in August 2021, the Tribunal ordered:

The Parties shall treat the details of the Arbitration as private and confidential, except to the extent necessary to comply with mandatory applicable laws, including regulatory obligations, court orders, or orders of a regulatory or an administrative body, or to comply with obligations to insurers, auditors, accountants, or investors. In such cases, the disclosure shall not extend beyond what is legally required and any non-governmental recipients shall commit to maintain the information in confidence.

ECF No. 6-1 (Procedural Order No. 2), ¶ 22 (the “Confidentiality Order”). This Order is consistent with the confidentiality provisions of the parties’ underlying shareholders agreement (the “Shareholders Agreement”), under which the parties agreed not to disclose any confidential information disclosed to it by another shareholder, subject to limited exceptions. *See* ECF No. 9-1 (Shareholders Agreement), § 6.03. The Opposition contains information covered by the Confidentiality Order and the confidentiality provisions of the parties’ Shareholders Agreement.

Undersigned counsel will meet and confer with counsel for Terra/DTH concerning confidentiality designations in this matter. We will then promptly re-file publicly any material that they agree is non-confidential and bring any remaining disputes concerning confidentiality to the Court for resolution. In the meantime, for the reasons discussed above, Peppertree/AMLQ respectfully request leave to file the Opposition under seal.

Respectfully submitted,

/s/ Gregg L. Weiner

Gregg L. Weiner

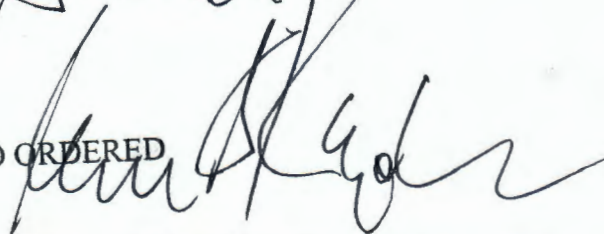
*Counsel for AMLQ Holdings (Cay), Ltd.*

/s/ Michael N. Ungar

Michael N. Ungar

*Counsel for Telecom Business Solution, LLC  
and LATAM Towers, LLC*

CC: All Counsel of Record

Granted  
SO ORDERED  
  
LEWIS A. KAPLAN, USDI  
6/1/23